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1. Introduction

Ensuring the safety and protection of their beneficiaries is an essential aspect of all charities work. Unless individuals are safe and treated well, with dignity and respect, it is impossible for them to realise their potential or to benefit fully from the work and activities supported by C40.

Over recent years, there has been increasing recognition of the way in which vulnerable people can be at risk of harm from organisations and institutions that are supposed to help them, either as a result of abuse and exploitation by individuals in positions of trust, or via programme activities in general.

As a consequence, there has been a significant increase in the efforts made by charities to ensure that no harm comes to beneficiaries or target communities from contact with their staff and associates or as a result of any of the organisation's activities. This duty of care extends beyond statutory safeguarding requirements.

The majority of C40's work does not involve direct work with children or vulnerable adults but C40 and or their partners will from time to time engage in activities with children and/or vulnerable adults that may be regulated by safeguarding legislation and it therefore takes seriously its obligations to generally operate in such a way as to ensure so far as is possible, that its work causes no harm to anyone with whom it engages, taking extra measures when children or vulnerable adults are present.

Given these obligations and in light of widely recognised risks, C40 has developed this policy to promote protection for all those people it comes into contact with as well as staff and volunteers within C40 itself and the partner organisations with which we work.

When in contact with vulnerable groups, C40 takes responsibility for ensuring it is doing all it can to protect such groups from all forms of harm, including abuse, neglect and exploitation, and to ensure appropriate action is taken if such harm occurs.

2. Definitions

A child is anyone who has not yet reached their 18th birthday. This is irrespective of local country definitions, including legal definitions, of when a child reaches adulthood.

A vulnerable adult is an individual aged 18 years or over who has needs for care and support, is at greater risk of significant harm due to factors such as gender, age, mental or physical health, or as a result of poverty, inequality or experience of displacement or crisis.

Abuse relates to any action or inaction that causes harm to another person (see section below on obligation to report). It can include physical abuse, emotional abuse, sexual abuse and neglect. It also includes abuse online and/or through mobile technology.

Exploitation is any actual or attempted abuse of a position of vulnerability, differential power or trust to profit monetarily, socially or politically

3. Understanding Risks

It is clear that vulnerable persons can be harmed, or put at risk of harm, by organisations and institutions, and that abuse of vulnerable groups can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.

Unintentional acts may lead to harm due to a lack of ‘due diligence’ or competence or through organisational negligence, such as inadequate care and supervision, lack of policies, procedures and guidance to inform programming and practice, or lack of staff compliance with legal requirements. Also, deliberate actions may be taken by people with intent to abuse vulnerable people.

Safeguarding is understood as:

- Protecting children or vulnerable adults at risk from maltreatment;
- Preventing impairment of the health or development of children or adults at risk;
- Ensuring that children and adults at risk enjoy circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children and adults at risk to have the best outcomes.

Safeguarding is about embedding practices throughout our organisation to ensure the protection of children and vulnerable adults wherever possible and dealing sensitively and appropriately with the situation should any incident arise.

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take a number of forms, including the following:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

4. Scope of This Policy

4.1 For C40 Staff and Contractors

Compliance with this policy is mandatory for all C40 staff, and compliance forms part of the contract of employment. For the purposes of this policy ‘staff’ is defined as anyone who works for, or is engaged by C40, either in a paid or unpaid, full time or part time capacity. This includes directly employed staff, contractors, agency staff, consultants, volunteers and interns.

4.2 For Board Members and Trustees

As board members and trustees act at all times in the best interests of C40 and its ultimate beneficiaries, they are also expected to comply with this policy. This expectation is made clear to board members and trustees through induction and the Trustee Code of Conduct.

4.3 For Partnership Organizations

This policy also applies to other organisations with whom C40 works where this involves direct work with children and/or vulnerable adults. C40 expects that the principles and approaches already shared with partnership organisations mean that they will fully support the values and commitments set out in this policy. C40 recognises that some will already have protection policies and associated measures in place. Where this is the case, they should have no difficulty in also complying with the standards set out in this policy.

5. Statement of Commitments

C40 commits to taking all reasonable measures to ensure vulnerable groups impacted by projects & programmes delivered and/or supported by C40 are protected as far as possible from harm, including exploitation, neglect and abuse of all kinds.

C40 commits to:

- Developing a ‘safety culture’ within C40 that creates and maintains protective environments
- Ensuring C40 staff and board members are fully cognisant of protection issues
- Increasing understanding and raising awareness of staff within the organisation of protection risks
- Taking appropriate and proportionate action if the policy is not complied with
- Developing criteria so that staff understand what constitutes non-compliance
- Making sure protection considerations are integrated into all aspects of the organisation
- Ensuring all staff are aware of their responsibilities to report concerns and of steps to take/who to go to in order to report such concerns.

6. Safeguarding Officer

C40 Cities will appoint a Safeguarding Officer to be responsible for implementing this policy. The Safeguarding Officer will also be responsible for ensuring compliance with this policy, that all safeguarding incidents are adequately investigated and, whenever necessary, for taking remedial action. Where necessary, the Safeguarding Officer may assign staff to be responsible for aspects of the Safeguarding Officer's responsibilities.

The Safeguarding Officer shall:

- Be the point of contact for all concerns, incidents and disclosures within C40;
- Receive information from professionals, children, parents and carers about any safeguarding concerns;
- Make any reports to regulators or statutory agencies;
- Monitor the overall trend of any safeguarding concerns and report annually to the Board of Directors or Trustees on the implementation of C40's policies and procedures;
- Maintain records of any safeguarding concerns raised, action taken and follow up required;
- Ensure that all professionals working for C40 are aware of their safeguarding duties, have read the C40 policies and will adhere to them at all times;
- Offer advice and support to professionals working for C40 to enable them to understand and fulfil their responsibilities; and
- Be familiar with legislation and statutory guidance and have undertaken appropriate safeguarding training.

This Safeguarding Officer will be the Director of Corporate Services.

7. Safer Recruitment

If an applicant will be required to work directly with children and/or vulnerable adults as part of their job responsibilities, then C40 will operate safer recruitment processes. Where a role is eligible for a Disclosure and Barring Service (DBS) Check, it will be the norm for applicants to start work only after their DBS clearance has been received. In cases where the appointment date is prior to the receipt of DBS clearance, a check administered by the Disclosure and Barring Service and appropriate risk assessment are to be undertaken without delay and regularly reviewed, covering the period until the DBS certificate is received and the staff member concerned will be appropriately supervised during this period. All other recruitment checks must be carried out. This includes a requirement of two

positive references confirming that their referees are not aware of any reason why the applicant should not work with children and/or vulnerable adults.

In jurisdictions where DBS does not apply, applicants for roles involving direct contact with children and or vulnerable adults will be subject to appropriate checks available in the relevant jurisdiction.

Systems will be put in place to ensure the timely renewal of DBS checks. Renewals take place every 3 years. Similarly, if a member of staff is appointed to a new role, a renewal should take place.

Referral to the Disclosure and Barring Service is a legal requirement for C40 in the UK and therefore standard procedure if a member of staff leaves employment at C40 because we consider them unsuitable to work with children or adults at risk.

8. Running Safe Event and Related Activities

C40 will ensure that any potential risks at C40 events and associated activities are successfully assessed and managed to keep children and vulnerable adults safe. Specifically, C40 will ensure that:

- a proper risk-assessment is done in each instance and that all identified risks are adequately managed;
- where youth and/or vulnerable adults are participating in a C40 event, the Safeguarding Officer will be in attendance or designate a participating, properly trained staff member to uphold all safeguarding responsibilities;
- all incidents will be recorded by the Safeguarding Officer;
- all activities have suitable and adequate insurance coverage;
- all staff are appropriately trained on safeguarding issues; and
- an adequate number of adults supervise C40 activities.

9. Recording and Storing Information

To help us plan and deliver effective events that include children and/or vulnerable adults, we may need to collect and store their personal data. Where this is necessary, C40 will protect personal data in line with C40's Data Protection Policy.

10. Embedding Organisational Commitment

In order to make its policy commitments a practical reality, C40 will instigate and/or strengthen a range of measures that focus on making sure the policy and associated procedures are in place, that people are supported to understand and work within the provisions of the policy, that it is fully and effectively integrated into all of our activities, and that it is subject to monitoring and review.

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C40 staff will receive regular training/briefing on their responsibilities and obligations under this policy.

Staff (and directors and trustees) will be expected to acknowledge and accept their responsibilities under this policy. Breaches of this policy by staff will be treated seriously and will be treated as a potential cause for disciplinary action.

Where a person or party is found to be out of compliance with this policy, the Safeguarding Officer will determine an appropriate course of action, taking into account all related policies, procedures, and contractual obligations.

Where staff engage with children or vulnerable adults, the Safeguarding Code of Conduct, attached as Appendix A, will apply.

11. Reporting and Responding to Concern

Where any safeguarding concern arises, whether as a result of an occurrence during an activity or arising from a complaint or otherwise, the concern will be treated seriously and dealt with in accordance with this policy and procedures.

When dealing with a complaint, accusation or whistleblowing, whether it is from a child or a concerned adult, the approach is the same:

- Stay calm and listen carefully to what is said.
- Reassure the person that to tell is the right thing to do.
- Find an appropriate and early opportunity to explain that it is very likely that the information will be shared with others. Do not promise to keep secrets even if the person threatens “only to tell” if it is a secret.
- Allow the person to dictate the pace.
- Ask questions only to seek clarification and make sure they are not leading questions.
- Explain what will happen next, who will be told.
- As soon as possible, record in writing what was said using the person’s own words whenever possible. Include any dates, times, names, name of person making record and make sure it is dated and signed.
- Also record the name of the person or persons with whom the information will be shared.
- Report to the Safeguarding Officer as soon as possible.

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It is not the responsibility of anyone in C40 to decide whether or not a child or vulnerable adult has been abused. It is, however, everyone's responsibility to report concerns and comply with this policy.

The concern must be reported to the Safeguarding Officer who will consider the circumstances and decide whether further investigation is needed or what other action to take. The Safeguarding Officer will ensure that all concerns are properly recorded, and records kept securely and confidentially. The Safeguarding Officer will liaise with statutory safeguarding bodies as required.

If there is a serious or immediate safeguarding concern that places a child or vulnerable person at risk, anyone can make a referral to social services or to the police to prevent harm.

C40 staff are required to immediately report any concerns of possible/actual harm, including abuse, exploitation, and neglect, and policy non-compliance, or risk of such, resulting from action or inaction by anyone covered by this policy. In the first instance, these should be reported to the Safeguarding Officer.

We are committed to reporting any incidents to the appropriate regulatory bodies (e.g. the Charity Commission for England and Wales) and government departments or funding bodies, as required. Where there is evidence that criminal activity may have taken place, the Safeguarding Officer will be responsible for reporting to the relevant police and/or safeguarding authorities as appropriate.

C40 has implemented a Whistleblowing policy aimed at encouraging a culture of openness and accountability wherein staff are confident that they can raise any matter of genuine concern without fear of reprisal in the knowledge that they will be taken seriously and that matters will be investigated appropriately and regarded as confidential.

C40 will develop strategies and tools to ensure effective implementation of this policy and to enable C40 and others to monitor its performance.

Existing systems for risk management, due diligence, monitoring and evaluation, audit and review, and other organisational performance mechanisms will be adapted to include indicators and processes by which implementation of the safeguarding policy can be measured.

12. Confidentiality

Everyone has the right to have their information dealt with sensitively and confidentially. However, confidentiality will never be a barrier to good safeguarding practice.

If a someone tells a professional that they or another person is being hurt physically, sexually or emotionally, or likely to be hurt in the future, or in danger of hurting someone else, then the professional will have to tell other people. Professionals will not promise to 'keep secrets' and will always make it clear that if they are told something that means someone is at risk of harm or is being harmed, this will have to be passed to the Safeguarding Officer.

Wherever possible, confidential information will not be passed to statutory agencies without the consent of the owner. There may be times, however, when disclosing confidential information

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without consent is necessary to safeguard a child/ vulnerable adult or because the information suggests that there is a risk to others. If this is the case, information will be passed to the appropriate statutory agency by the Safeguarding Officer, making it clear that consent has not been sought and why, or that consent has been refused. The reasons for the disclosure without consent must be recorded and stored securely by the Safeguarding Officer.

13. Review

This policy will be regularly reviewed to ensure that any incidents which may have occurred will inform its development and / or that it remains fit for purpose in accordance with the work we are doing.

14. Related Policies

- Whistleblowing Policy
- Recruitment Policy
- Disciplinary Policy
- Code of Conduct
- Dignity at Work
- Data Protection Policy

Appendix A

Safeguarding Code of Conduct

In the course of their work with C40, C40 staff:

1. Shall treat every child or vulnerable adult with dignity and respect regardless of differences of ethnicity, religion, age, ability, gender, sexual orientation, class and economic circumstances.
2. Shall not make suggestions to individuals or offer inappropriate or offensive advice that could be considered abusive. C40 staff shall not commit any form of psychological abuse, such as verbally or physically intimidating, threatening, humiliating, degrading, shaming, blaming or coercing a child or vulnerable adult.
3. Shall not give personal gifts or cash to children or vulnerable adults.
4. Shall not initiate, or respond to, sexual contact with children or vulnerable adults.
5. Shall not develop relationships with children and/or vulnerable adults outside of the scope of C40-related events.
6. Shall not be alone with a child or vulnerable adult in a private place that cannot be readily seen by other responsible adults.
7. Shall not offer cigarettes or alcohol to children or vulnerable adults.
8. Shall not use their personal electronic devices such as mobile phones or tablets to take any photographs or videos of children or vulnerable adults, shall not post information about children or vulnerable adults on social media, and shall not post anything to social media which would bring C40 into disrepute.
9. Are always responsible for the interaction between an adult and a child even when it appears that a child is acting in a provocative manner. It is the responsibility of the adult to set appropriate boundaries that protect the best interest of the child.
10. Shall ensure that all events and activities involving any children/ vulnerable adults are in the best interests of the children involved.